

EXHIBIT

6

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON,)
SERGIO DELEON, FLOYD J. CARRIER,)
ANNA BURNS, MICHAEL MONTEX,)
PENNY POPE, OSCAR ORTIZ, KODY)
OZIAS, JOHN MELLOR-CRUMLEY, JANE)
DOE, JOHN DOE, LEAGUE OF UNITED)
LATIN AMERICAN CITIZENS (LULAC),)
AND DALLAS COUNTY, TEXAS,)
)
Plaintiffs,)
)
v.) CIVIL ACTION NO.
) 2:13-CV-193 (NGR)
RICK PERRY, Governor of Texas; and JOHN) [Lead case]
STEEN, Texas Secretary of State,)
)
Defendants.)

UNITED STATES OF AMERICA,)
)
Plaintiffs,)
)
v.) CIVIL ACTION NO.
STATE OF TEXAS, JOHN STEEN, in his) 2:13-CV-263 (NGR)
official capacity as Texas Secretary of State;) [Consolidated case]
and STEVE McCRAW, in his official capacity)
as Director of the Texas Department of Public)
Safety,)
Defendants.)

TEXAS STATE CONFERENCE OF NAACP)
BRANCHES; and the MEXICAN)
AMERICAN LEGISLATIVE CAUCUS OF)
THE TEXAS HOUSE OF)
REPRESENTATIVES,)

)
Plaintiffs,
)
v.
) CIVIL ACTION NO.
) 2:13-CV-291 (NGR)
JOHN STEEN, in his official capacity as) [Consolidated case]
Secretary of State of Texas; and STEVE)
McCRAW, in his official capacity as Director)
of the Texas Department of Public Safety,)

Defendants.

**DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 26(A)**

Defendants hereby submit their Initial Disclosures to Plaintiffs, Consolidated Plaintiffs, and Interested Parties under Rule 26(a)(1) of the Federal Rules of Civil Procedure. Defendants reserve the right to supplement these Initial Disclosures as additional discovery, investigation, and analysis may warrant. Defendants also do not waive any protections provided by any potential privileges, including but not limited to, the legislative privilege, the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity. Defendants likewise do not waive the right to object, on any and all grounds, to (1) the evidentiary use of the information contained in these Initial Disclosures; and (2) discovery requests relating to these Initial Disclosures. Defendants also incorporate by reference Defendants' Motion to Dismiss and do not believe Plaintiffs have stated any claims on which relief can be granted and without waiving the same. Defendants provide the following disclosure responses based on the allegations contained in Plaintiffs' pleadings.

The State of Texas produced numerous documents on behalf of the Secretary of State, the Department of Public Service, the Governor's Office, the Lieutenant Governor's Office and the Texas Legislature which are identified in the attached production log. See Exhibit A. The State of Texas has in its possession but did not produce documents believed to be privileged and identified in privilege logs, incorporated by reference here, and previously produced in *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012).

8. Documents produced by the Department of Justice in *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012) identified by Bates numbers US_00000001 – US_00021928;

The original documents remain in the possession of the Department of Justice.

9. Documents produced by Texas State Conference of NAACP Branches in *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012) identified by Bates numbers NAACP-00000001 – NAACP-00006021;

The original documents remain in the possession of the Texas State Conference of NAACP Branches.

10. Documents produced by the Mexican American Legislative Caucus of Texas House Representatives in *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012), identified by Bates numbers MALC-00000001 – MALC-00009210;

The original documents remain in the possession of the Mexican American Legislative Caucus of Texas House Representatives.

11. Documents produced by Texas League of Young Voters Education Fund in *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012) identified by Bates numbers TLYV_0000000001 – 0000000748;

The original documents remain in the possession of the Texas League of Young Voters Education Fund.

12. Documents produced by the Texas Legislative Black Caucus on behalf of the Texas Legislative Black Caucus, League of Women Voters of Texas, Justice Seekers, Southwest Workers Union, La Union del Pueblo Entero, Rev. Ronald Wright, Rev. Peter Johnson, and Donald Wright in the *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012) identified by Bates numbers TLBC_0000001-00000906;

The original documents remain in possession of the Texas Legislative Black Caucus and the various entities it represented.

13. Documents produced by Rodriguez Intervenors (Mi Familia Vota Education Fund, Southwest Voter Registration Education Project, Nicole Rodriguez and Victoria Rodriguez) in the *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012) identified by Bates numbers RODR-001 – RODR-00154.

The original documents remain in the possession of the Rodriguez Intervenors.

14. The State of Texas incorporates by reference all exhibits disclosed, provided or used during *Texas v. Holder*, 888 F.Supp. 2d 113 (D.D.C.2012), regardless of which party, Plaintiff, Defendant, or Party Intervenors disclosed, provided or used such exhibits.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34, the documents or other evidentiary material on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable. Plaintiff is not claiming damages.

D. For inspection and copying, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Respectfully submitted.

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/s/ John B. Scott
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MCCRAW

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2013, a true and correct copy of the foregoing document was served via the Court's ECF system on all counsel of record.

/s/ John B. Scott
JOHN B. SCOTT
Deputy Attorney General for Civil Litigation